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Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SELINA KEENE, MELODY FOUNTILA,  
MARK MCCLURE,

Plaintiffs,

v.

CITY AND COUNTY OF SAN FRANCISCO

Defendant.

CONSOLIDATED ACTIONS

Lead Case No. 22-cv-01587-JSW

Case No. 22-cv-04319-JSW

Case No. 22-cv-06013-JSW

Case No. 22-cv-03975-JSW

Case No. 22-cv-07455-JSW

Case No. 22-cv-04633-JSW

Case No. 22-cv-07645-JSW

Case No. 22-cv-00211-JSW

**SUBMISSION REGARDING STATUS OF  
DISCOVERY AGREEMENTS**

1 TO THE COURT:

2 Pursuant to the Court's order dated August 22, 2023 (Dkt. No. 126), Defendant hereby  
 3 submits an updated status report regarding the Parties' negotiations about parameters and  
 4 scheduling on a consolidated discovery plan. On August 30, 2023, counsel for the Debrunner  
 5 Plaintiffs, Charlotte Sanders, the Guardado Plaintiffs, and the Keene Plaintiffs all joined in a case  
 6 management statement objecting to Defendant's proposed discovery plan. (Dkt. No. 130-134.)  
 7 Plaintiff Cook separately lodged his objections to Defendant's proposed discovery plan. (Dkt. No.  
 8 135.)

9 After additional meet and confer efforts between the Parties, they are unable to agree on  
 10 proposed timing, format, or limitations/parameters with regard to either written discovery or  
 11 depositions. Therefore, Defendant respectfully requests that the Court consider the positions set  
 12 forth by the Parties, and set forth an order regarding presumptive discovery limitations and timing  
 13 in the consolidated matters, so that discovery may proceed in a streamlined and consistent manner  
 14 between the various actions.

15  
 16 DATED: September 1, 2023

SEYFARTH SHAW LLP

17  
 18 By: /s/ Coby M. Turner

19 Coby M. Turner

20 Eric M. Lloyd

21 Dawn R. Solowey (*pro hac vice*)

Yoon-Woo Nam

22 Attorneys for Defendant

23 CITY AND COUNTY OF SAN FRANCISCO  
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